



August 19, 2019

Regional Freedom of Information Officer
U.S. EPA, Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912
(617) 918-1102

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552 I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning operations at two sites of Philip A. Hunt / Olin in Lincoln, Rhode Island. Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

Please note that, based on corporate genealogy research, other names associated with Philip A. Hunt Chemical Corporation at these sites in Lincoln, Rhode Island may include:

- Progress Chemical Company
- Wayland Chemical Company
- Olin Corporation
- Olin Chemicals
- Olin Hunt Specialty Products Inc.
- OCG Microelectronic Materials, Inc.
- Olin Microelectronic Chemicals, Inc.
- Arch Chemicals, Inc.
- Arch Specialty Chemicals
- GEM Management Inc.

RCRA Requested Documents

We understand that hazardous waste generated by Philip A. Hunt Chemical Corporation at 40 Moshassuck Road, Industrial Circle, Lincoln, RI and 1 Wellington Road, Lincoln Rhode Island was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following two RCRA facility IDs: RID000769760 and RID001202589.

The RCRA corrective action work at Moshassuck Road, Industrial Circle in Lincoln is listed by EPA as Arch Specialty Chemicals. The RCRA corrective action work at Wellington Road is now listed as GEM Management Inc. (Olin Hunt) on EPA's website for Rhode Island cleanups.

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Inspections and correspondence for the period 1985 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981 to 1985
- RCRA Part B Application
- Correspondence concerning corrective action obligations at this site

TSCA Inventory Requested Documents

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Philip A. Hunt Chemical Corporation/Olin Hunt/Olin Chemicals at 40 Moshassuck Road, Industrial Circle, Lincoln, RI and Wellington Road, Lincoln, RI identified certain chemicals used at these sites. We therefore request the following documents related to this facility produced as required by TSCA:

- 1986 Reporting Year Data
- 1990 Reporting Year Data

TSCA PCB Regulations

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated Philip A. Hunt Chemical Corporation at 40 Moshassuck Road, Industrial Circle, Lincoln, RI and Wellington Road in Lincoln, RI. We therefore request the following documents related to PCBs and this installation:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving these locations or parties, including the following known PCB activity:
 - One 1988 waste manifest for 6,500 pounds of PCB (R007) at Industrial Circle, Lincoln, RI

AIR Requested Documents

We understand that Philip A. Hunt Chemical Corporation / Wayland Chemical / Arch Specialty Chemicals at 40 Moshassuck Road, Industrial Circle, Lincoln, RI and Wellington Road in Lincoln, RI, operated under the regulation of the Clean Air Act. We therefore request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Correspondence for the earliest period possible

NPDES Requested Documents

We understand that under the Clean Water Act, installations discharging waste to surface waters are required to obtain a permit and register with the National Pollutant Discharge Elimination System. For Philip A. Hunt Chemical Corporation / Olin / Wayland Chemical / Arch Specialty Chemicals at 40 Moshassuck Road, Industrial Circle, Lincoln, RI and Wellington Road in Lincoln, RI, we therefore request the following documents:

- Earliest NPDES registration and permit applications
- Inspection and correspondence files

Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at HBergen@historyassociates.com.

Sincerely,

Hilary Bergen